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June 4, 2020

Marlene H. Dortch
Secretary, Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Expanding Flexible Use of the 3.7 to 4.2 GHz Band, GN Docket No. 18-122

Dear Ms. Dortch:

On June 2, 2020, on behalf of Verizon, Rachael Bender, Philip Junker, and I, together with Adam Krinsky and Erin Griffith of Wilkinson Barker Knauer, LLP, spoke by telephone with Giulia McHenry, Margie Weiner, and Jonathan Campbell from the Office of Economics and Analytics; Jim Schlichting of the International Bureau; and Matthew Pearl, Paul Powell, and Anna Gentry of the Wireless Telecommunications Bureau. On June 3, 2020, Rachael Bender, Philip Junker, Adam Krinsky, and I spoke with Erin McGrath, legal advisor to Commissioner O’Rielly and separately with Will Adams, legal advisor to Commissioner Carr. On June 4, 2020, the same group spoke with Umair Javed, legal advisor to Commissioner Rosenworcel and separately with Bill Davenport, chief of staff and legal advisor to Commissioner Starks.

During the meetings, we expressed the importance of mid-band spectrum and appreciation for the Commission’s commitment to auction C-band spectrum starting on December 8 of this year. In order to encourage an efficient auction that maximizes the benefits of the C-band for 5G, we discussed targeted modifications to the C-band auction design that will allow for the most successful use of this spectrum. We referenced the attached chart illustrating these points during our discussions with the legal advisors to commissioners.

We reaffirmed our support for, and the industry-wide consensus on, the FCC’s alternative proposal regarding product categories. This sensible option will divide the product categories based on when the spectrum will become available. Product category P1 would include the 100 megahertz in 3.7-3.8 GHz in the 46 Phase I PEAs that will become available on December 5, 2021. Product category P2 would include all remaining spectrum, which will become available on December 5, 2023. This will simplify bidding and facilitate an assignment phase that will allow for contiguous blocks of spectrum.

It is widely recognized that large, contiguous blocks of spectrum are ideal for 5G services. Therefore, we also urged the Commission to maximize opportunities for wide channels by adopting a dual assignment phase mechanism.

A dual assignment phase will allow this spectrum to be put to its highest use during all phases of the C-band transition. The final assignment across all 280 MHz in every PEA will provide the opportunity for contiguous spectrum holdings desired for 5G. An interim assignment in just those 46 Phase I PEAs where winning bidders will access spectrum in December 2021 will at the same time allow early access without compromising the ability to obtain a final wideband channel. This is the most efficient solution that can be accomplished directly following the conclusion of the clock auction.

Finally, during the bureau presentation only, we reiterated our position for lowering the upfront payment amounts from \$0.015 to \$0.010 per MHz-pop, which is comparable to the amount set in Auction 105. We also urged the FCC to adopt its proposal for a \$0.03 uniform minimum opening bids price per MHz-POP. These are important factors that encourage competition while protecting the integrity of the auction.

We fully support moving forward with the C-band auction starting on December 8, 2020. The Commission should make the aforementioned adjustments to facilitate a successful auction that will result in large swaths of contiguous spectrum for 5G services.

Sincerely,

A handwritten signature in black ink, appearing to read "Will Adams", with a stylized flourish at the end.

Attachment

cc: Erin McGrath
Will Adams
Umair Javed
Bill Davenport
Giulia McHenry
Margie Weiner
Jonathan Campbell
Jim Schlichting
Matthew Pearl
Paul Powell
Anna Gentry

| Flexible-Use Licenses | | | | | | | | | | | | | |
|-----------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
| A ₁ | A ₂ | A ₃ | A ₄ | A ₅ | B ₁ | B ₂ | B ₃ | B ₄ | B ₅ | C ₁ | C ₂ | C ₃ | C ₄ |
| Category P1 | | | | | Category P2 | | | | | | | | |

Contiguous Assignments